

# Morgan Lewis

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**VIA ECF**

The Honorable Stewart D. Aaron  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1970  
New York, NY 10007

**Re: In re ACTOS Antitrust Litig. (1:13-cv-09244-RA-SDA)**

Dear Judge Aaron:

Pursuant to Section 1.1 of the Privilege Protocol (ECF No. 513), the undersigned counsel for Defendants Takeda Development Center Americas, Inc., Takeda Pharmaceutical Company Limited, Takeda Pharmaceuticals U.S.A., Inc., and Takeda America Holdings, Inc. (collectively, "Takeda") hereby certifies that Takeda's Morgan Lewis attorneys have complied in good faith with the requirements of the privilege review protocol, in the form entered by the Court, and are not intentionally withholding or redacting any non-privileged information or information within the scope of Takeda's privilege waiver.

Respectfully submitted,



/s/ R. Brendan Fee

R. Brendan Fee

*Counsel for Defendants  
Takeda Development Center Americas, Inc., Takeda  
Pharmaceutical Company Limited, Takeda  
Pharmaceuticals U.S.A., Inc., and Takeda America  
Holdings, Inc.*

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